

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Carriers Eligible to)	WC Docket No. 09-197
Receive Universal Service Support)	
)	
Commnet Wireless, LLC)	
)	
Petition for Streamlined Designation as a)	
Lifeline Broadband Provider Eligible)	
Telecommunications Carrier)	

**COMMNET WIRELESS, LLC
PETITION FOR STREAMLINED DESIGNATION AS A LIFELINE BROADBAND
PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER**

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SUMMARY

Commnet Wireless, LLC¹ (“Commnet” or the “Company”) hereby seeks designation as a Lifeline Broadband Provider (LBP) Eligible Telecommunications Carrier (ETC), pursuant to section 214(e)(6) of the Communications Act of 1934, as Amended (the Act), section 54.202 of the Federal Communications Commission’s (FCC’s or the Commission’s) rules, the *Lifeline Modernization Order*,² and the *LBP Guidance Public Notice*³ for the limited purpose of providing mobile Broadband Internet Access Service (BIAS) supported by the Universal Service Fund (USF) Lifeline program. Section 214(e)(6) permits the Commission to grant LBP ETC designation and the Commission’s rules provide that states may not designate LBP ETCs. As described in greater detail herein, Commnet is capable of providing service that meets the minimum service standards set forth in section 54.408 of the Commission’s rules and satisfies all of the requirements for streamlined designation as an LBP ETC. The Company has an established track record of providing quality voice and broadband services to both Lifeline- and non-Lifeline subscribers. The Company has provided, without interruption, facilities based local and long distance voice services, broadband service and Lifeline voice services for over two years and provides voice and/or broadband service to more than 38,000 subscribers, including 12,900 non-Lifeline subscribers in six states. Therefore, Commnet is eligible for the 60-day streamlined processing of its LBP ETC designation and this Petition should be deemed granted within 60 days. *See* 47 C.F.R. § 54.202(d)(1).

¹ On behalf of itself and its wholly-owned subsidiary Commnet Four Corners, LLC.

² *See Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016), 31 FCC Red. 3962 (“*Lifeline Modernization Order*”).

³ *See Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket Nos. 11-42, 09-197, Public Notice, DA 16-118 (rel. Sept. 30, 2016) (“*LBP Guidance Public Notice*”).

Commnet's proposed BIAS Lifeline offering will provide eligible Lifeline subscribers with at least 500 megabytes (MB) of Internet access at reliable 3G speeds each month, increasing to one gigabyte (1 GB) beginning December 1, 2017, and to two gigabytes (2 GB) beginning December 1, 2018. The Company will not conduct credit checks or collect deposits from Lifeline-eligible subscribers, thereby eliminating service barriers for low-income or credit-challenged subscribers.

Further, all persons subscribing to Commnet's BIAS Lifeline offering will receive a Wi-Fi-enabled smartphone at no cost to the subscriber. This smartphone will help address the most compelling needs - including closing the "jobs gap" and the "homework gap" - of these consumers by allowing them to establish email accounts and access Internet- and apps-based job applications; monitor online homework assignments and progress reports; manage medical benefits and appointments; and stay in touch with friends and relatives.

Commnet's BIAS Lifeline offering will give customers the ability to access the Internet from almost anywhere, enabling them to engage in the digital economy in a manner comparable to the access enjoyed by non-Lifeline subscribers. Moreover, available hotspot-capable phones permit Commnet's Lifeline subscribers to tether other devices - *e.g.*, tablets, laptops and PCs - to their smartphone to perform tasks such as completing homework assignments or filling out job-applications that are designed for a larger screen.

Designating Commnet as an LBP ETC is in the public interest. With such status, Commnet will provide consumers with an alternative for obtaining quality, reliable and convenient 3G or better broadband service, when and where they need it, in areas where 46.1% of the population lives below the poverty line.⁴ Accordingly, and consistent with the streamlined

⁴ U.S. Census Bureau, 2000 data

processing provided for LBP ETCs in the *Lifeline Modernization Order*, Commnet respectfully requests expeditious review and approval of this Petition.

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Commnet Wireless, LLC⁵ (Commnet or the Company) pursuant to section 214(e) of the Communications Act of 1934, as Amended (the Act), 47 U.S.C. § 214(e) and section 54.202 of the Federal Communications Commission's (Commission's or FCC's) rules, 47 C.F.R. § 54.202, hereby requests streamlined designation as a Lifeline Broadband Provider (LBP) Eligible Telecommunications Carrier (ETC) of Broadband Internet Access Service (BIAS).⁶ Commnet does not herein request ETC status for the purpose of receiving support for voice only Lifeline service. Commnet acknowledges that designating ETC status for voice-only Lifeline service remains with the state regulatory agencies.

⁵ On behalf of itself and its wholly owned subsidiary Commnet Four Corners, LLC

⁶ See *Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962 (2016) (*Lifeline Modernization Order*) and *Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket Nos. 11-42, 09-197, Public Notice, DA 16-118 (rel. Sept. 30, 2016) (*LBP Guidance Public Notice*). Broadband internet access service is defined by the Commission as a "service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service." *Id.*, ¶30.

I. ABOUT COMMNET

For almost two decades, Commnet has been the premier wholesale wireless provider in the U.S. Commnet's mission has been to provide coverage in unserved and underserved rural areas -- those areas not covered by the national wireless carriers. As a result, Commnet has grown to be a trusted roaming partner of all four national carriers. Additionally, Commnet has roaming agreements with virtually all U.S. carriers and over 150 international carriers. This is possible because Commnet is one of the few companies that operate both GSM-based technologies (GSM/UMTS/HSPA/HSPA+) which support AT&T, T-Mobile, and most international users, as well as CDMA-based technologies including EVDO Rev. A which supports Sprint, Verizon and East Asian carriers. In addition, Commnet operates 700 MHz LTE, which supports 4G broadband data for both GSM-based and CDMA-based carriers.

Over the past five years, Commnet has been a growing retail provider in rural and underserved markets. Commnet supports its retail subscribers with either or both CDMA and LTE networks, depending upon what Commnet's spectrum holdings are within a given geographic area. As a result, Commnet has been a pioneer in bringing wireless telecommunications to Tribal areas, generally through cooperative arrangements with individual tribal governments or entities owned by tribal governments. Either directly or through affiliates, and under its "Choice Wireless" trademark, Commnet operates wireless networks serving the Navajo Nation,⁷ the Hopi Reservation, the Mescalero Apache Reservation, the San Carlos Apache Reservation, the Tohono O'odham Reservation, the Picuris Pueblo and the Northern Cheyenne Reservation. These networks have brought advanced wireless services to the residents of those tribal areas.

⁷ Commnet's operations within the Navajo Nation are via NTUA Wireless, LLC, which is managed and owned 49% by Commnet, but majority-owned by the Navajo Tribal Utility Authority, an instrumentality of the Navajo Nation government.

II. COMMNET MEETS THE COMMISSION'S REQUIREMENTS FOR DESIGNATION AS A LIFELINE BROADBAND PROVIDER

Section 54.202 of the Commission's rules outlines the requirements that must be met before the FCC can designate a carrier as an LBP ETC. As discussed in further detail below, Commnet satisfies these requirements and designating Commnet as a LBP ETC is warranted.

A. Commnet is a Common Carrier.

As a provider of BIAS to the public, Commnet is a common carrier. In the Lifeline Modernization Order, the Commission recognized BIAS as a telecommunications service. Commnet will provide wireless telecommunications service throughout its requested designated service area and, as a wireless telecommunications service provider, Commnet is regulated as a common carrier.⁸ Commnet, therefore, meets the ETC requirement of being a common carrier.

B. Commnet will provide the supported services using its own facilities or (if needed) a combination of its own facilities and resale of another carriers service

Commnet will provide the supported services specified in Section 54.101(a) of the Commission's Rules throughout the proposed service area using its own facilities and resale or roaming if necessary. Commnet's facilities include its cellular network infrastructure, which consists of switching, trunking, cellular sites and network equipment.

C. Commnet certifies that it will comply with the service requirements applicable to the support that it receives, including the applicable minimum service standards⁹

Commnet certifies that it will comply with the minimum service requirements applicable to the support the Company receives, including the minimum service standards. Commnet will provide Lifeline supported mobile BIAS throughout the proposed service area and will make

⁸ 47 U.S.C § 332(c)(1)(A)

⁹ See 47 C.F.R. § 54.202(a)(1)(i); 54.408; *LBP Guidance Public Notice*, ¶10.

such services available to all qualified customers consistent with its coverage footprint. Commnet's proposed service area is attached hereto as **Exhibit A**.

Commnet also certifies that the Company's Lifeline supported mobile BIAS will comply with the Lifeline program's minimum service standards.¹⁰ Commnet, under its "Choice Wireless" trademark, already provides Lifeline supported mobile BIAS plans in areas where the company has been designated an ETC. Further, Commnet understands that it must continue to comply with any future additions to or amendments of the Lifeline broadband rules and will revise its offerings as necessary to comply with Part 54 service standards.

In addition to providing broadband service to Lifeline subscribers, Commnet will provide subscribers with a Wi-Fi-enabled smart phone at no cost to the Lifeline-eligible consumer.¹¹ The Company also will offer hotspot-enabled phones permitting Lifeline-eligible subscribers to share their broadband service with others in their household. Lifeline-eligible subscribers will be able to purchase device upgrades providing benefits such as the ability to enjoy high-quality photos and video, experience faster load-times for on-device apps and services, and benefit from better storage and memory.

D. Commnet has the ability to remain functional in emergency situations.¹²

Commnet is a facilities-based wireless telecommunications carrier with its own switching, transport, cell sites, and associated telecommunications facilities in the proposed ETC service area. Commnet will be able to function in emergency situations as set forth in Section 54.201(a)(2), which includes a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around

¹⁰ 47 C.F.R. §54.408(b)(2)

¹¹ Commnet is not responsible for replacement costs of lost or stolen phones, or for phones damaged due to a subscriber's act or omission. See terms and conditions of service on the Commnet website, <https://us.choice-wireless.com/terms-and-conditions.html>.

¹² See 47 C.F.R. § 54.202(a)(2); LBP Guidance Public Notice, ¶10.

damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Specifically, Commnet will have the following capabilities to remain functional in emergency situations:

Availability of fixed and portable back-up power generators at various network locations throughout Commnet's network that can be deployed in emergency situations.

Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels ("COWs"), redundant facilities, and dynamic rerouting of traffic over alternate facilities.

A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-solutions, such as additional capacity and antenna towers can be deployed.

Sites not equipped with fixed generators typically have battery back-up systems installed to maintain service in the event of a widespread power outage.

E. Commnet will satisfy applicable consumer protection and service quality standards.¹³

Section 54.202(a)(3) of the Commission's rules state that a wireless applicant's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service (CTIA Consumer Code) will satisfy this consumer protection and service quality requirement. Commnet fully complies with applicable consumer protection requirements, including without limitation the CTIA Consumer Code, and commits to continue to do so.

Additionally, Commnet subscribers can reach the Company in the following ways:

- Web: <https://us.choice-wireless.com/contact.html>
- Customer Support Hotline: (800) 246-4239
- Customer service is available between the hours of 6:00 a.m. - 9:00 p.m. CST, Monday-Saturday.

¹³ See 47 C.F.R. § 54.202(a)(3); *LBP Guidance Public Notice*, ¶10.

F. Commnet is financially and technically capable of providing Lifeline-supported mobile broadband services in compliance with the Commission's rules.¹⁴

Commission rule 54.202(a)(4) requires an ETC applicant to demonstrate financial and technical capability to comply with the applicable Lifeline service requirements. Commnet is a wholly-owned subsidiary of ATN International, Inc. ("ATN"), a publicly-traded corporation (symbol ATNI). ATN has a seventeen-year track record of increasing its quarterly dividend. As set forth in its Form 10-K filing with the Securities Exchange Commission for 2015, ATN has available working capital of over \$384 million as of December 31, 2015. Thus, Commnet is more than adequately capitalized.

Further, Commnet has been operating a wholesale wireless network for almost two decades and has more than half a decade of experience providing retail wireless service, including Lifeline service, in extremely rural and Tribal areas. In fact, Commnet is already providing Lifeline supported mobile broadband internet service in rural and Tribal areas that meet the Commission's rules. Therefore, Commnet is technically capable of providing Lifeline supported mobile broadband service in compliance with the Commission's rules.

G. Terms and Conditions of Commnet's Broadband Plan for Lifeline Customers

Section 54.202(a)(6) of the Commission's rules state that common carriers seeking designation as an ETC must provide a summary of the Lifeline rate plans and the terms and conditions of such plans. Commnet will offer a Non-Tribal Lifeline Plan and a Tribal Lifeline Plan. The details of these rate plans are as follows:

¹⁴ See 47 C.F.R. §54.202(a)(4); *LBP Guidance Public Notice*, ¶10.

	Non-Tribal Lifeline Plan	Tribal Lifeline Plan
Data (3G or better)	500 MB	3 GB
Voice Minutes	500 Minutes	Unlimited
Texts	Unlimited	Unlimited
Handset	Free	Free
Cost to Lifeline Subscribers	Free	Free

The terms and conditions for such plans are available at <https://us.choicewireless.com/terms-and-conditions.html>.

H. Commnet will advertise the availability of its service and charges in a manner reasonably designed to reach Lifeline-eligible consumers and will comply with the Commission’s revised rules regarding information to be included in advertisements.¹⁵

Commnet intends to offer its Lifeline-supported mobile broadband internet services to all eligible consumers and, accordingly, will advertise its Lifeline services using media reasonably calculated to reach the general public as clarified in the *Lifeline Modernization Order*. In that order, the Commission clarified that “media of general distribution” is “any media reasonably calculated to reach the general public or, for an LBP, the specific audience that makes up the demographic for a particular service offering.”¹⁶

Commnet *already* complies with the Commission’s Lifeline obligations with respect to Commnet’s existing Lifeline voice and broadband service offerings. Commnet’s advertising includes mobile enrollment events as a means of reaching those consumers that are likely to qualify for Lifeline broadband services and who may lack available means to fax or scan and email proof of eligibility documents. The Company uses media of general distribution to

¹⁵ See 47 C.F.R. §§ 54.201(d)(2), 54.405(b); 47 U.S.C. § 214(e)(1)(B).

¹⁶ *Lifeline Modernization Order*, ¶364.

advertise the availability of its services, as well as the schedule of mobile enrollment events, to potential Lifeline subscribers, and will expand its advertising efforts if necessary to ensure that Lifeline-eligible subscribers are aware of the service offerings, consistent with 47 C.F.R. § 54.405(b). Commnet already ensures, and will continue to ensure, that all of its Lifeline advertising materials comply with section 54.405(c) of the Commission's rules. Commnet's advertising materials state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) that documentation is necessary for enrollment; and (vii) Commnet is the provider of the services. In addition, Commnet's application/certification form will state that subscribers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

I. Commnet will comply with the additional ETC obligations.

Commnet is aware of the Commission's requirements regarding certification and verification of a customer's qualification for Lifeline service, as set forth in 47 C.F.R. § 54.410, and already employs procedures to ensure those requirements are met, with respect to Commnet's pre-existing Lifeline offerings.¹⁷ Commnet has detailed and comprehensive procedures in place to address customer certification and verification requirements as well as

¹⁷ Among other things, Commnet retains copies of documentation demonstrating the applicant's income-based or program-based eligibility determination for Lifeline service as required by Commission rules. *See* 47 C.F.R. § 54.410(b)(1)(ii), (c)(1)(ii).

those requirements addressing de-enrollment and duplication of benefits.¹⁸ These procedures comply with the Commission's customer certification and verification requirements.¹⁹

Commnet also checks each applicant against the National Lifeline Accountability Database prior to initiating service, as well as against Commnet's own duplicate checking system. Commnet will utilize the National Lifeline Eligibility Verifier once that system is available. Commnet also complies, and will continue to comply, with the annual certification and reporting requirements and the Commission's measures to prevent waste, fraud and abuse of Lifeline services.²⁰ Commnet will not seek Lifeline reimbursement for any subscriber that received Lifeline-supported mobile broadband service from another provider within the previous twelve months, except as permitted by Commission rules.²¹

A Commnet employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that subscriber on an FCC Form 497 for reimbursement. Finally, Commnet does not charge a number-portability fee for Lifeline accounts.²² Commnet will timely pay all applicable federal, state, and local regulatory fees, including universal service and E911 fees.

J. Commnet qualifies for streamlined processing of its LBP ETC designation

The Commission has sole jurisdiction, pursuant to section 214(e)(6), to review and grant the Company's request for designation as an LBP ETC and, in its *Lifeline Modernization Order*, ¶232, the Commission explicitly preempted state designation of broadband providers. Commission rule 54.202(d) provides for a streamlined process for approving LBP ETC petitions where certain criteria are met. Petitions for LBP ETC designation are deemed granted within

¹⁸ See 47 C.F.R. §§ 54.405(e), 54.410(d)-(f).

¹⁹ See 47 C.F.R. § 54.410.

²⁰ See 47 C.F.R. §§ 54.416, 54.422

²¹ See 47 C.F.R. § 54.411(a),(c).

²² See 47 C.F.R. § 54.401(e).

sixty days of the filing date if the applicant has provided BIAS to the public for at least two years and serves at least 1,000 non-Lifeline subscribers with voice telephony and/or BIAS as of the filing date. *See* 47 C.F.R. § 54.202(d)(1). Commnet qualifies for this streamlined processing, as it has been offering BIAS for at least two years, and serves over 38,000 voice and/or BIAS subscribers, including 12,900 non-Lifeline subscribers as of the date of this filing. Therefore, Commnet seeks streamlined designation of its request for LBP ETC designation in the areas identified below.

K. Areas for Which LBP ETC Status Is Requested

By this Petition, Commnet requests LBP ETC designation to serve the Tribal areas set forth in set forth in **Exhibit A**. According to 2000 Census Data issued by the U.S. Census Bureau, 54.8% of residents on the Havasupai Reservation had no telephone service. Furthermore, as the 2000 census data demonstrates below, the requested areas (1) have low per capita incomes, high unemployment rates and high poverty levels; and (2) are entirely rural and sparsely populated.

Havasupai Reservation, AZ	
Total Population in Proposed Service Area	503
Unemployment Rate in Proposed Service Area	14.70%
Population not in labor force	64.40%
Population below Poverty Level	46.10%
Per Capita Income	\$7,422
Area considered Non-farm Rural	100%

L. Notice to affected Tribal Government and Tribal Regulatory Authority

Section 54.202(c) requires a common carrier that seeks designation as an ETC under Section 214(e)(6) on Tribal lands to provide a copy of its petition to the affected tribal government and tribal regulatory authority at the time it files its petition with the Commission. Commnet acknowledges such a requirement and certifies that a copy of its Petition will be

provided to the tribal governments and/or tribal regulatory authorities identified in **Exhibit B** at the time of this filing.

III. THE PUBLIC INTEREST WILL BENEFIT FROM GRANTING LBP ETC STATUS TO COMMNET

Before granting a request for ETC designation, the Commission must find that grant of the designation would be in the public interest. The Commission has described broadband as the “essential communications medium of the digital economy,” noting that “[a]ccess to broadband shortens the distance to high-quality education, meaningful employment, and reliable healthcare. It is now the dominant technology used to communicate, educate, inform, and entertain.”²³ However, the Commission has recognized that a “digital divide” still exists with low-income consumers “adopting broadband at rates well below the rest of the country.”²⁴

Grant of Commnet’s Petition will enable the Company to expand its provision of service to Lifeline-eligible consumers with access to convenient and much-needed Internet access at 3G speeds, thereby helping to bridge the digital divide. Moreover, Commnet’s Lifeline-supported mobile broadband service plan is designed with disadvantaged consumers in mind and, as such, will help the Commission meet core Lifeline program goals, including closing the job and homework gaps and increasing competitive pressure to ensure that subscribers get high value for their Lifeline benefits.

Specifically, the Company will offer to low-income consumers a prepaid mobile broadband service, with at least 500 MB of data per month on its 3G and 4G networks at no cost to the consumer, thereby increasing consumer choice and making services more affordable and

²³ *Lifeline Modernization Order*, ¶12

²⁴ *Id.*, ¶19

accessible.²⁵ The monthly allowance of at least 500 MB of data per month on its 3G and 4G networks provides speed and capacity for consumers to utilize the Internet to meet their work, health and school-related needs. When coupled with free Wi-Fi available in community anchor institutions, local businesses and elsewhere, Commnet's mobile broadband service will enable subscriber access to multiple gigabytes worth of data each month, enabling those consumers to use data-hungry apps and services such as online video courses and real-time video communications just like non-Lifeline consumers. The Company will also offer for customers at least one handset with hotspot capability for no charge. The hotspot capability enables consumers to use their Commnet data by tethering a variety of different devices, including laptops and tablets, to complete homework assignments or conduct other activities that sometimes require a larger screen.

Commnet's broadband service will enable Lifeline-eligible subscribers to access the Internet for tasks such as researching jobs, communicating with their employer, children's schools or family and friends by email, or completing homework assignments. The mobile nature of the service will be particularly attractive to Lifeline-eligible consumers who will then have immediate and convenient Internet access – at home, on a bus commuting to work or school or during a lunch break at work – thereby eliminating the need to undertake time-consuming or costly travel to a library or other location for public internet access.

Commnet's experience and longevity as a provider of Lifeline services in rural areas across the West and Southwest demonstrates the Company's commitment and ability to provide quality Lifeline services to eligible, low-income consumers in compliance with program requirements. As of September 2016, Commnet provided Lifeline voice telecommunications

²⁵ As previously noted, this 500 MB/mo will be increasing over time in accordance with the Commission's staged schedule for LBP ETCs to deliver 2 GB/mo by December 1, 2018.

services to over 25,000 Lifeline subscribers and has established detailed and comprehensive procedures to ensure service is provided in compliance with Lifeline requirements. Commnet will leverage this experience and expertise to ensure its Lifeline-supported mobile broadband services are offered in compliance with the Commission's rules, thereby eliminating waste, fraud and abuse of the Lifeline program. This proven track record, combined with an attractive offering of broadband capacity, the ability to supplement capacity at affordable rates, and the provision of a Wi-Fi-enabled smartphone at no charge ensures Commnet will provide more choices and more value for Lifeline eligible consumers. Accordingly, grant of the Petition is in the public interest.

IV. ANTI-DRUG ABUSE CERTIFICATION

Commnet certifies that no party to this Petition is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

V. CONCLUSION

For the foregoing reasons, grant of the instant Petition for Limited Designation as an LBP ETC is in the public interest and is warranted in accordance with section 214(e)(6) of the Act.

Respectfully submitted,

COMMNET WIRELESS, LLC

December 8, 2016

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1200 New Hampshire Ave. NW, Suite 600
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By: _____
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202-955-5516

DECLARATION

I, Rohan Ranaraja, hereby declare under penalty of perjury, that I am the officer of Commnet Wireless, LLC in charge of Lifeline-support administration and compliance, that I have read the foregoing Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier, and that to the best of my knowledge, information and belief, all facts set forth therein (including without limitation the certification that no party to this Petition is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862) are true and correct.

Executed December 7, 2016



Rohan Ranaraja

COMMNET WIRELESS, LLC

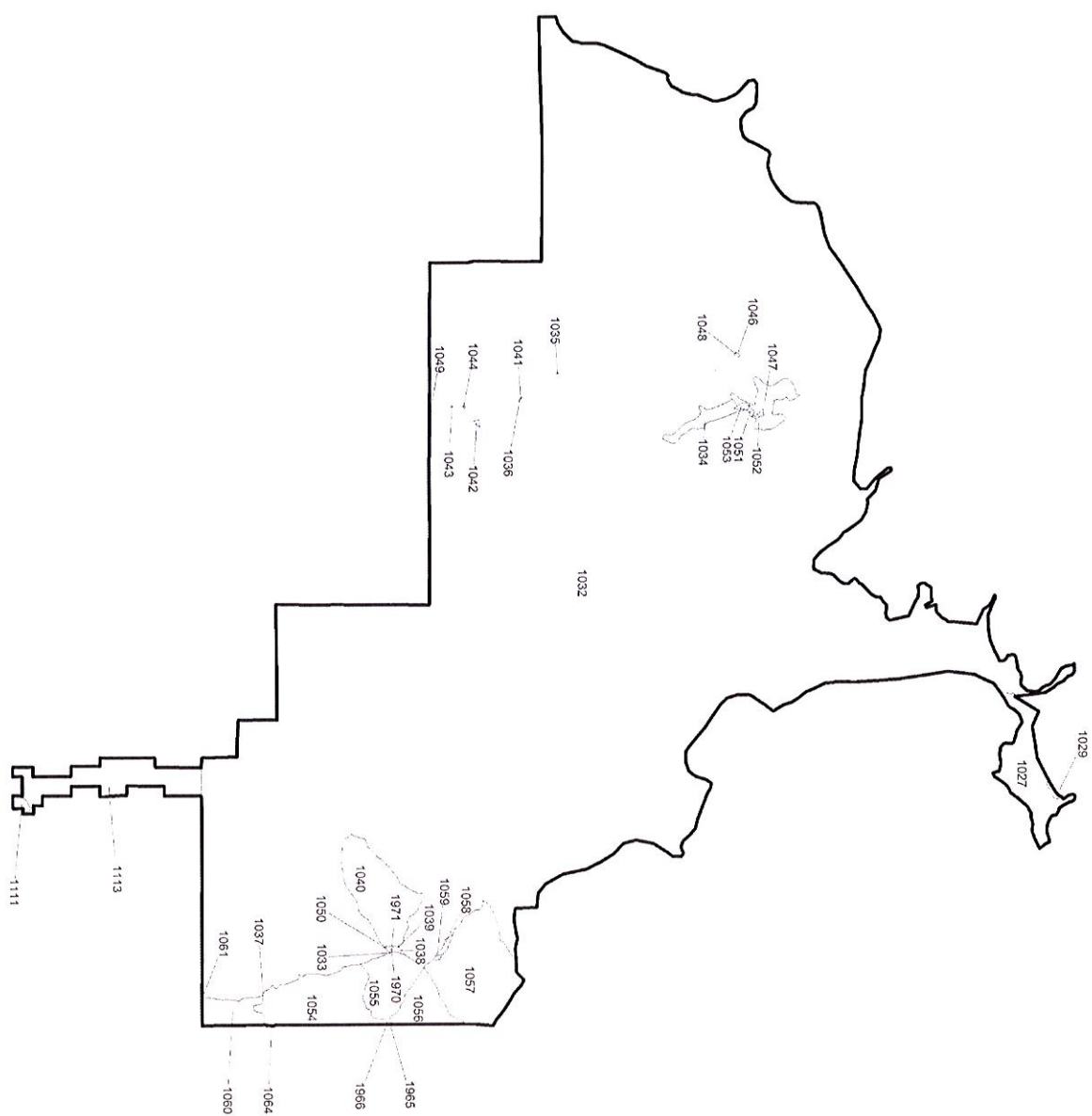
PETITION FOR STREAMLINED DESIGNATION AS LBP ETC

EXHIBIT A

COMMNET WIRELESS, LLC

EXHIBIT A

State Name	County Name	Block	Block ID
Arizona	Coconino	1027	040050023001027
Arizona	Coconino	1029	040050023001029
Arizona	Coconino	1032	040050023001032
Arizona	Coconino	1033	040050023001033
Arizona	Coconino	1034	040050023001034
Arizona	Coconino	1035	040050023001035
Arizona	Coconino	1036	040050023001036
Arizona	Coconino	1037	040050023001037
Arizona	Coconino	1038	040050023001038
Arizona	Coconino	1039	040050023001039
Arizona	Coconino	1040	040050023001040
Arizona	Coconino	1041	040050023001041
Arizona	Coconino	1042	040050023001042
Arizona	Coconino	1043	040050023001043
Arizona	Coconino	1044	040050023001044
Arizona	Coconino	1046	040050023001046
Arizona	Coconino	1047	040050023001047
Arizona	Coconino	1048	040050023001048
Arizona	Coconino	1049	040050023001049
Arizona	Coconino	1050	040050023001050
Arizona	Coconino	1051	040050023001051
Arizona	Coconino	1052	040050023001052
Arizona	Coconino	1053	040050023001053
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Arizona	Coconino	1055	040050023001055
Arizona	Coconino	1056	040050023001056
Arizona	Coconino	1057	040050023001057
Arizona	Coconino	1058	040050023001058
Arizona	Coconino	1059	040050023001059
Arizona	Coconino	1060	040050023001060
Arizona	Coconino	1061	040050023001061
Arizona	Coconino	1064	040050023001064
Arizona	Coconino	1111	040050023001111
Arizona	Coconino	1113	040050023001113
Arizona	Coconino	1965	040050023001965
Arizona	Coconino	1966	040050023001966
Arizona	Coconino	1970	040050023001970
Arizona	Coconino	1971	040050023001971



COMMNET WIRELESS, LLC
PETITION FOR STREAMLINED DESIGNATION AS LBP ETC

EXHIBIT B

COMMNET WIRELESS, LLC
EXHIBIT B

Havasupai Tribal Government

Chairman Don Watahomigie
PO Box 10
Supai, AZ 86435
Telephone: (928) 448-2731